



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

June 16, 1992

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

**SUBJECT:** Treatment of Perchloroethylene (Perc) for the November 15, 1992  
Ozone State Implementation Plan (SIP) Submittals

**FROM:** John Calcagni, Director  
Air Quality Management Division (MD-15)

**TO:** Director, Air, Pesticides and Toxics Management Division,  
Regions I and IV  
Director, Air and Waste Management Division,  
Region II  
Director, Air, Radiation and Toxics Division,  
Region III  
Director, Air and Radiation Division,  
Region V  
Director, Air, Pesticides and Toxics Division,  
Region VI  
Director, Air and Toxics Division,  
Regions VII, VIII, IX, and X

The Environmental Protection Agency (EPA) is planning to propose a rule which would add perc to the list of compounds that are exempt as a volatile organic compound (VOC) for purposes of preparing SIP's to attain the national ambient air quality standards for ozone. Perc is a solvent which is primarily used in dry cleaning and degreasing. We expect the proposal to be published in the Federal Register this summer, and hope the final action will be published by December 1992. This memorandum is intended to provide you with guidance on how to treat this exemption in the ongoing Title I ozone nonattainment process.

The planned publication of this proposal raises questions about how perc should be treated in ozone SIP submittals, such as RACT rules and inventories, which are due to be submitted by November 15, 1992. When EPA's final rule exempting perc is published, the compound will no longer need to be controlled as an ozone precursor. Also, no credit will be granted toward the required VOC emissions reductions in the SIP even if perc is controlled.

Thus, EPA should not urge any State to adopt new perc rules or to modify existing perc rules to make them more stringent for the upcoming November 1992 SIP submittals. However, we are not urging States to remove any rules to control perc which they now have, since perc is listed as a hazardous air pollutant in section 112 of the Clean Air Act, and these regulations could have a beneficial impact in controlling air toxics.

Because States have been following EPA guidance issued in March 1991 for developing their 1990 baseline emission inventories, we recommend that States do not attempt to adjust their

inventories to remove perc at this late date. However, States should plan on adjusting their baseline inventory, in conjunction with their 15 percent VOC emissions reduction plans due November 15, 1993, to remove perc and the other compounds which were added to the list of compounds exempted as VOC's on February 3, 1992 (57 FR 3941). The perc proposal notice states that States should not include negligibly reactive compounds in their emission inventories for determining reasonable further progress, and may not take credit for controlling these compounds in their ozone control strategy.

If you have any questions or desire additional information, please contact Bill Johnson of my staff at (919) 541-5245.

cc: Denise Devoe  
Bruce Jordan  
Bill Laxton  
John Rasnic  
John Seitz  
Lydia Wegman